

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)

Plaintiff,)

v.)

EAGLE GRAPHICS, INC and)
JOSEPH BENDER, in his capacity as President)
of Eagle Graphics, Inc.)

Defendants,)

and)

NEXT GENERATION PRINTING, INC.)

Reach and Apply Defendant.)

C.A. No. 04-12509 DPW

MOTION TO REACH AND APPLY

Now comes the Plaintiff in the above-entitled matter and moves the Court to reach and apply the funds due or to be due to the Defendant Eagle Graphics, Inc. (“Defendant Eagle”) from Reach and Apply Defendant Next Generation Printing, Inc. Plaintiff seeks an Order restraining Reach and Apply Defendant Next Generation Printing, Inc. from transferring, assigning, alienating or paying Defendant Eagle or its President and shareholder, Joseph Benger a/k/a “Craig” Benger, any sums owed by Reach and Apply Defendant Next Generation to Defendant Eagle, pending further action of this court. The reasons supporting this motion are set forth in the attached memorandum.

Dated: April 13, 2006

For the Plaintiff,

Catherine M. Campbell
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/S/ Catherine M. Campbell
Attorney for Plaintiff,

Certificate of Service

I, Catherine M. Campbell, hereby certify that I caused a copy of the foregoing to be hand-delivered this day to Laurence Donoghue, Esq., Morgan, Brown & Joy, LLP, 200 State Street, 11th Floor, Boston, MA 02109-2605 and mailed this day by U.S. first-class mail to John A. Rothstein, Esq., Next Generation Printing, Inc., 179 Campanelli Pkwy., Stoughton, MA 02072.

Date: April 13, 2006

/s/Catherine M. Campbell
Catherine M. Campbell